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### NOTES OF CASES.

THE TORRENS LAW.—In *Tyler v. Judges* (Jan 3, 1900), 55 N. E. 812, the Supreme Court of Massachusetts upholds the constitutionality of the Torrens system of registration of land titles, recently adopted in that State.

CRIMINAL LAW—PROXIMATE CAUSE.—The fact that a person mortally wounded cut his own throat and hastened his death is held, in *People v. Lewis* (Cal.), 45 L. R. A. 783, insufficient to relieve the person who inflicted the fatal wound of liability.

TAXATION—SITUS OF DEBTS.—Notes and mortgages owned by a person who is domiciled in another State, but kept within the State by an agent, are held, in *New Orleans v. Stemple* (Advance Sheets U. S. 110), to be subject to taxation by the laws of the State in which they are held.

HABEAS CORPUS—SUSPENSION BY GOVERNOR.—The power of the governor or military officer in command to suspend the writ of habeas corpus, or disregard it if issued, for the purpose of suppressing an insurrection or rebellion, is sustained in *Re Boyle* (Idaho), 45 L. R. A. 832; and on application for such a writ the truth of recitals in the governor's proclamation is held not to be open to question.

TITLE OF ACTS—CHANGE IN TITLE AFTER ENACTMENT.—In the title of a bill it was described as amendatory of section "40" of the Compiled Statutes, and in this form passed both houses of the legislature. Before it was presented to the governor for approval, the title was changed so as to describe the act as amendatory of section "48," and in this form it was signed by the governor. *Held*, the change was material, and the act is void. *Weis v. Ashley* (Neb.), 81 N. W. 318.

CRIMINAL LAW—ONE ACT CONSTITUTING SEVERAL OFFENCES.—A conviction for furnishing intoxicating liquors to a minor without legal authority is held, in *Com. v. Vaughn* (Ky.), 45 L. R. A. 858, to constitute no bar to a prosecution for selling the liquor without a license, where the sale to the minor is an offense irrespective of the license, and the sale without a license is an offense whether sold to a minor or other person. With this case is a note reviewing the decisions as to the prosecution and punishment of distinct offenses committed by a single sale of intoxicants.

CONSTITUTIONAL LAW—APPROPRIATION BY CONGRESS FOR CHURCH HOSPITAL.—A constitutional provision against laws respecting the establishment of religion is held, in *Bradfield v. Roberts* (Advance Sheets U. S. 121), insufficient to condemn an appropriation by Congress of money to a hospital owned by a corporation composed of the members of a particular church, or a monastic order, or sisterhood therein, but subject to no visitation, supervision, or control by any ecclesiastical authority whatever.